

From: "Eron Dodak" <edodak@integral-corp.com>  
To: jessica@ridolfi.com  
"Novak, Madi" <Novak.Elisabeth@epa.gov>  
CC: shil@yakamafish-nsn.gov  
dlivermore@integral-corp.com  
"Michael PINTO" <michael.pinto@total.com>  
Date: 1/27/2021 12:45:55 PM  
Subject: RE: Arkema Project Area: Pre-Design Investigation Work Plan

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Hi Jessica,

That is correct, Figures 2-3b and 2-3c are subsets of the data shown on Figure 2-3a for the shallow zone. The purpose of Figures 2-3b and 2-3c is related to the Technology Application Decision Tree (Figure 28 of the ROD). The technology assignments for the shallow zone are different for areas where the RAL exceedance is less than or greater than a depth of 5 ft. Figures 2-3b and 2-3c were included in the PDI work plan just for reference so the ROD Technology Application Decision Tree can be evaluated using the existing dataset.

Please let me know if this answers your question. Thanks!

**ERON DODAK**

Tel: 503.943.3614 | Cell: (b) (6)

**INTEGRAL CONSULTING INC.**

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From: jessica@ridolfi.com <jessica@ridolfi.com>  
Sent: Wednesday, January 27, 2021 9:27 AM  
To: Eron Dodak <edodak@integral-corp.com>; 'Novak, Madi' <Novak.Elisabeth@epa.gov>  
Cc: 'shil@yakamafish-nsn.gov' <shil@yakamafish-nsn.gov>; David Livermore <dlivermore@integral-corp.com>; 'Michael PINTO' <michael.pinto@total.com>  
Subject: RE: Arkema Project Area: Pre-Design Investigation Work Plan

Thank you for the explanation. So as I understand it, figures 2-3b and 2-3c are (nonoverlapping) subsets of the data shown on 2-3a.

The part that's still a little confusing to me is: what is the point of figures 2-3b and 2-3c if they are just subsets of figure 2-3a with no additional information? Figure 2-3d shows additional contaminants, but I feel like either I'm missing some relevant point or 2-3b and 2-3c are redundant. Thank you again for the clarification!

JESSICA WINTER-STOLTZMAN | Senior Environmental Scientist | **RIDOLFI**  
Direct: 206.413.7053 | [www.ridolfi.com](http://www.ridolfi.com)

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From: Eron Dodak <edodak@integral-corp.com>  
Sent: Wednesday, January 27, 2021 7:04 AM  
To: jessica@ridolfi.com; 'Novak, Madi' <Novak.Elisabeth@epa.gov>  
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Subject: RE: Arkema Project Area: Pre-Design Investigation Work Plan

Hi Jessica and Madi,

Each station with a RAL exceedance should only be plotted on one figure since the maximum depth of RAL exceedance cannot be both below and above a depth of 5 ft. Attached is a revised version of Figure 2-3b with the stations removed that had RAL exceedances with a depth greater than 5 ft (the removed stations are all on Figure 2-3c).

Please let me know if you have any questions. Thanks for bringing this to our attention!

**ERON DODAK**

Tel: 503.943.3614 | Cell: (b) (6)

**INTEGRAL CONSULTING INC.**

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**From:** Eron Dodak

**Sent:** Monday, January 25, 2021 3:12 PM

**To:** [jessica@ridolfi.com](mailto:jessica@ridolfi.com); Novak, Madi <[Novak.Elisabeth@epa.gov](mailto:Novak.Elisabeth@epa.gov)>

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**Subject:** RE: Arkema Project Area: Pre-Design Investigation Work Plan

Hi Jessica and Madi,

We are looking into this question and will get back to you shortly. Thanks!

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**From:** [jessica@ridolfi.com](mailto:jessica@ridolfi.com) <[jessica@ridolfi.com](mailto:jessica@ridolfi.com)>

**Sent:** Monday, January 25, 2021 1:49 PM

**To:** Novak, Madi <[Novak.Elisabeth@epa.gov](mailto:Novak.Elisabeth@epa.gov)>; [jessica@ridolfi.com](mailto:jessica@ridolfi.com); Eron Dodak <[edodak@integral-corp.com](mailto:edodak@integral-corp.com)>

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**Subject:** RE: Arkema Project Area: Pre-Design Investigation Work Plan

I got an out of office autoreply from Eron and forwarded this message to David Livermore at Integral.

JESSICA WINTER-STOLTZMAN | Senior Environmental Scientist | **RIDOLFI**

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**From:** Novak, Madi <[Novak.Elisabeth@epa.gov](mailto:Novak.Elisabeth@epa.gov)>

**Sent:** Monday, January 25, 2021 1:47 PM

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**Subject:** RE: Arkema Project Area: Pre-Design Investigation Work Plan

Thanks Jessica,

Eron, I'm a little confused by this also, would you mind clarifying?

Thank you,

Madi

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**From:** [jessica@ridolfi.com](mailto:jessica@ridolfi.com) <[jessica@ridolfi.com](mailto:jessica@ridolfi.com)>

**Sent:** Friday, January 22, 2021 10:37 AM

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**Subject:** RE: Arkema Project Area: Pre-Design Investigation Work Plan

Hello Eron,

I have a question (not a comment, just requesting clarification) about Figure 2-3 in the PDIWP showing depth of exceedances.

I am confused about the difference between Figure 2-3b and 2-3c. These both have the title "maximum depth of RAL



exceedances for all focused COCs - shallow zone" with different depth ranges. Is the idea that b is showing the locations where the max depth of exceedance is shallower than < 5 ft, while c is showing the locations where the max is >5 ft? But some dots seem to appear on both figures, so I don't think I'm interpreting it correctly. Maybe the idea is that b is showing all the locations where there's a RAL exceedance shallower than 5 ft, and c is showing all the locations where there's a RAL exceedance deeper than 5 ft, so some locations have both? That seems to make sense but doesn't quite match the figure titles which refer to maximum depth.

Thanks

JESSICA WINTER-STOLTZMAN | Senior Environmental Scientist | RIDOLFI  
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**From:** Novak, Madi <[Novak.Elisabeth@epa.gov](mailto:Novak.Elisabeth@epa.gov)>  
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**To:** Novak, Madi <[Novak.Elisabeth@epa.gov](mailto:Novak.Elisabeth@epa.gov)>; [liverman.alex@deq.state.or.us](mailto:liverman.alex@deq.state.or.us); [avangeel@indecon.com](mailto:avangeel@indecon.com); [bayuk.dana@deq.state.or.us](mailto:bayuk.dana@deq.state.or.us); Leake, Benjamin <[Leake.Benjamin@epa.gov](mailto:Leake.Benjamin@epa.gov)>; [brandy.humphreys@grandronde.org](mailto:brandy.humphreys@grandronde.org); Shaffer, Caleb <[Shaffer.Caleb@epa.gov](mailto:Shaffer.Caleb@epa.gov)>; Scott Coffey <[coffeyse@cdmsmith.com](mailto:coffeyse@cdmsmith.com)>; Courtney Johnson (<[courtney@crag.org](mailto:courtney@crag.org)>) <[courtney@crag.org](mailto:courtney@crag.org)>; Deirdre F. Donahue (<[deirdre.donahue@sol.doi.gov](mailto:deirdre.donahue@sol.doi.gov)>) <[deirdre.donahue@sol.doi.gov](mailto:deirdre.donahue@sol.doi.gov)>; [dexb@yakamafish-nsn.gov](mailto:dexb@yakamafish-nsn.gov); DeMaria, Eva <[DeMaria.Eva@epa.gov](mailto:DeMaria.Eva@epa.gov)>; Franziska Landes <[Franziska.Landes@state.or.us](mailto:Franziska.Landes@state.or.us)>; Gail Fricano (<[gfricano@indecon.com](mailto:gfricano@indecon.com)>) <[gfricano@indecon.com](mailto:gfricano@indecon.com)>; Gustavson, Karl <[Gustavson.Karl@epa.gov](mailto:Gustavson.Karl@epa.gov)>; [holly.partridge@grandronde.org](mailto:holly.partridge@grandronde.org); Young, Hunter <[Young.Hunter@epa.gov](mailto:Young.Hunter@epa.gov)>; [jennifer.graham@ctwsbnr.org](mailto:jennifer.graham@ctwsbnr.org); Jennifer Hart (<[jhart@indecon.com](mailto:jhart@indecon.com)>) <[jhart@indecon.com](mailto:jhart@indecon.com)>; [Jeremy\\_Buck@fws.gov](mailto:Jeremy_Buck@fws.gov); [jessica@ridolfi.com](mailto:jessica@ridolfi.com); Joe Pitt (<[joepitt@ctuir.org](mailto:joepitt@ctuir.org)>) <[joepitt@ctuir.org](mailto:joepitt@ctuir.org)>; Clark, Josie <[Clark.Josie@epa.gov](mailto:Clark.Josie@epa.gov)>; [jweis@hk-law.com](mailto:jweis@hk-law.com); Katie Daugherty <[Katie.J.DAUGHERTY@state.or.us](mailto:Katie.J.DAUGHERTY@state.or.us)>; Kevin Parrett <[Parrett.Kevin@deq.state.or.us](mailto:Parrett.Kevin@deq.state.or.us)>; Knudsen, Laura <[Knudsen.Laura@epa.gov](mailto:Knudsen.Laura@epa.gov)>; [lacey.david@deq.state.or.us](mailto:lacey.david@deq.state.or.us); Peterson, Lance <[peteronle@cdmsmith.com](mailto:peteronle@cdmsmith.com)>; [shil@yakamafish-nsn.gov](mailto:shil@yakamafish-nsn.gov); [lauren.senkyr@noaa.gov](mailto:lauren.senkyr@noaa.gov); Lynch, Kira <[lynch.kira@epa.gov](mailto:lynch.kira@epa.gov)>; Mark.PUGH <[Mark.PUGH@state.or.us](mailto:Mark.PUGH@state.or.us)>; Matt Johnson - JD Law Umatilla rep. (<[MatthewJohnson@ctuir.org](mailto:MatthewJohnson@ctuir.org)>) <[MatthewJohnson@ctuir.org](mailto:MatthewJohnson@ctuir.org)>; Michel L. Wigney (<[MLW@karnopp.com](mailto:MLW@karnopp.com)>) <[MLW@karnopp.com](mailto:MLW@karnopp.com)>; [NaomiStacy@ctuir.org](mailto:NaomiStacy@ctuir.org); Natalie Swan <[swan@yakamafish-nsn.gov](mailto:swan@yakamafish-nsn.gov)>; Nina Gal (<[ngal@indecon.com](mailto:ngal@indecon.com)>) <[ngal@indecon.com](mailto:ngal@indecon.com)>; [paul.seidel@state.or.us](mailto:paul.seidel@state.or.us); [robert.brunoe@ctwsbnr.org](mailto:robert.brunoe@ctwsbnr.org); [Robert.Neely@noaa.gov](mailto:Robert.Neely@noaa.gov); [rose@yakamafish-nsn.gov](mailto:rose@yakamafish-nsn.gov); [greenfield.sarah@deq.state.or.us](mailto:greenfield.sarah@deq.state.or.us); SCHATZ Jeff <[SCHATZ.Jeff@deq.state.or.us](mailto:SCHATZ.Jeff@deq.state.or.us)>; Shaffer, Caleb <[Shaffer.Caleb@epa.gov](mailto:Shaffer.Caleb@epa.gov)>; [sherrie@skyenviron.com](mailto:sherrie@skyenviron.com); Buerger, Ted <[ted\\_buerger@fws.gov](mailto:ted_buerger@fws.gov)>; [teresa@avocetconsulting.com](mailto:teresa@avocetconsulting.com)  
**Subject:** FW: Arkema Project Area: Pre-Design Investigation Work Plan

Good Morning TCT,

The revised Arkema Pre-Design Investigation Work Plan is available for download, please see link below. A TCT review is not required, but EPA will be performing a responsiveness review. Don't hesitate to reach out with any questions or concerns.

Thank you,  
Madi

Madi Novak, Remedial Project Manager  
EPA Region 10, Superfund & Emergency Management Division  
Oregon Operations Office  
503-326-3277  
She/Her/Hers

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**From:** Eron Dodak <[edodak@integral-corp.com](mailto:edodak@integral-corp.com)>  
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Subject: Arkema Project Area: Pre-Design Investigation Work Plan

Hi Madi,

On behalf of LSS, agent for Arkema Inc., below is a link to download an electronic copy of the pre-design investigation (PDI) work plan for the Arkema Project Area. This work plan is being submitted in accordance with Section 3.1(a) of the Administrative Settlement Agreement and Order on Consent for Remedial Design at the River Mile 7 West Project Area (CERCLA Docket No. 10-2020-0054).

The ShareFile Links below include the following:

- Compiled PDF of the work plan text, tables, figures, and appendices that can be downloaded to your computer. Please note that this work plan is tagged to the extent feasible. Materials received from third party sources in the appendices may not be fully tagged.
- Compiled PDF of the redline/strikeout versions of the draft PDI text that was modified to address the EPA team's comments. The PDF includes text from the work plan and Appendices A, B, C, and G that were modified to address the EPA team's comments.

Please let me or Mike Pinto know if you have any questions about this submittal. Thanks!

#### PDI Work Plan

(b) (6)

#### Redline/Strikeout Text

(b) (6)

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